

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CLARK LANDIS, et al.,

Plaintiff,

vs.

WASHINGTON STATE MAJOR
LEAGUE BASEBALL STADIUM
PUBLIC FACILITIES DISTRICT, et al,

Defendants.

NO. 2:18-cv-01512-BJR

**SECOND DECLARATION OF
MICHAEL TERASAKI IN SUPPORT
OF PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

I, MICHAEL TERASAKI, hereby declare as follows,

1. I am an attorney at Washington Civil and Disability Advocate, counsel for Plaintiffs in this matter, and I am over the age of 18 and competent to testify on the matters stated herein from personal knowledge.

2. Attached hereto as Exhibit F is a true and correct copy of a photo of the "Hop Box" beer stand at T-Mobile Park taken June 19, 2019. No modifications appear to have been made to the counter since Mr. Jim Terry measured it prior to the start of the 2019 baseball season.

3. Attached hereto as Exhibit G is a true and correct copy of a photo of the "Edgar's Home Run Porch" at T-Mobile Park taken June 19, 2019. No modifications appear to have been made

1 to the counter since Mr. Jim Terry photographed it prior to the start of the 2019 baseball season
2 and only standing-height tables are present during the game.

3 4. Attached hereto as Exhibit H are true and correct copies of photos of the "The Pen" drink
4 rail area and patio at T-Mobile Park taken June 19, 2019. No lowered counters or lowered tables
5 are present in The Pen area.

6 5. Mr. Bill Endelman was deposed on June 12, 2019. Mr. Endelman previously submitted a
7 Declaration in Support of Defendants' Opposition to Motion for Summary Judgment (*see* Dkt. #
8 23).

9 6. A true and correct copy of pages from Mr. Endelman's deposition transcript is attached
10 hereto as Exhibit I.

11 7. A true and correct copy of pages from Mr. Trevor Gooby's deposition transcript is
12 attached hereto as Exhibit J.

13 8. Attached hereto as Exhibit K is a true and correct copy of a photo of a lowered table next
14 to a Shortstop Beer stand at T-Mobile Park taken June 19, 2019.

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16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge and belief.

18 DATED 6/24/19
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21 Michael Terasaki
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